

**BEST AVAILABLE COPY**  
REMARKS

The Office Action mailed April 11, 2006, has been carefully reviewed and the following remarks are submitted in response thereto. Claims 1-20 are pending.

The rejection of claims 1, 2, 4, 5, 9-14, and 16-20 under 35 USC 103(a) as being unpatentable over Wadlow et al in view of Barrett is respectfully traversed. Claim 1 recites a particular network architecture wherein a plurality of security service pathways each provide a respective combination of security service features. A service selection gateway directs user traffic to a respective one of the security service pathways or to a pass-through router in response to a subscriber configuration. Consequently, a highly efficient handling of user traffic is obtained because once particular packets are sent to a security service pathway the corresponding combination of security features are automatically applied to the packets, unlike the prior art which requires routing decisions for each packet to be made at each security element in order to send it to the next security element in a combination.

Wadlow fails to disclose security service pathways wherein each pathway provides a respective combination of security service features. Figure 4 of Wadlow shows the various points where different types of packet filtering can be performed. Figure 6 shows various points where different types of application filtering can be performed. Any particular traffic is routed among the necessary points depending upon the desired security for a user. For example, Figure 7 of Wadlow shows a multi-element path for providing a directly-routed, packet-filtered path passing through points Pcsr-cpn, Pcsr-ctc, Pclr-ctc, Pclr-psn, Per-psn, and Per-in. Figure 8 shows a multi-element path to provide an application-filtered connection (i.e., a different combination of security features), wherein the corresponding packets are still routed to packet-filtering points Pcsr-cpn, Pcsr-ctc, Pclr-ctc, Pclr-psn, Per-psn, and Per-in and are additionally routed to application-filtering point Ahag-psn. Therefore, Wadlow fails to teach or suggest the plurality of security service pathways of the present claims which each provide a respective combination of security service features. Upon being directed to a pathway by the service selection gateway, no further routing between

-2-

(Serial No. 10/003,816)

**BEST AVAILABLE COPY**

security devices is necessary with the present invention since the pathway defines the security features. In contrast, Wadlow consumes resources to decide whether a packet leaving point Per-in in the above example should next go to point Ahag-psn or not.

The distribution of packets by the present invention to the correct security service pathway having the desired combination of security service features depends upon the service selection gateway identifying the appropriate pathway and then routing a packet to the entry point of that pathway. From then on, the packet automatically passes through the selected security features. The architecture in Wadlow is incapable of performing in this manner.

The addition of Barrett fails to strengthen the rejection. Barrett merely shows that a device through which all traffic is passing can be reconfigured to provide different levels of security. It provides no motivation or suggestion to reconstruct a different network architecture so that there are a plurality of security service pathways each providing a respective combination of security service features and a service selection gateway distributing packets to a particular pathway based on a subscriber configuration. Therefore, claims 1, 2, 4, 5, 9-14, and 16-20 are allowable over the cited references.

The rejection of claims 3, 6-8, and 15 under 35 USC 103(a) as being unpatentable over Wadlow et al in view of Barrett and further in view of Schneider et al is respectfully traversed. Schneider fails to correct for the deficiencies of Wadlow and Barrett noted above. Therefore, claims 3, 6-8, and 15 are allowable.

In view of the foregoing amendment and remarks, claims 1-20 are now in condition for allowance. Favorable action is respectfully solicited.

Respectfully submitted,



Mark L. Mollon  
Attorney for Applicant(s)  
Reg. No. 31,123

Dated: July 11, 2006

-3-

(Serial No. 10/003,816)

**BEST AVAILABLE COPY**